

HOFLAND & TOMSHECK
228 SOUTH FOURTH ST, FIRST FLOOR
LAS VEGAS, NEVADA 89101
P: (702) 895-6760 • F: (702) 731-6910

1 **HOFLAND & TOMSHECK**
2 Joshua Tomsheck, Esq.
3 State Bar of Nevada No. 009210
4 josht@hoflandlaw.com
5 228 South 4th Street, 1st Floor
6 Las Vegas, Nevada 89101
7 (702) 895-6760
8 (702) 731-6910 facsimile
9 *Attorney for Defendant*

10 **IN THE UNITED STATES DISTRICT COURT**

11 **FOR THE DISTRICT OF NEVADA**

12 **UNITED STATES OF AMERICA**

13 Case No.: 2:18-cr-00206-JAD-DJA

14 Plaintiff,

15 vs.

16 **KEYNAN ROSE,**

17 **Stipulation and Order to Continue**
18 **Sentencing**
19 **(First Request)**

20 **Defendant.**

21 IT IS HEREBY STIPULATED AND AGREED by and between Christopher Chiou,
22 Acting United States Attorney, and Christopher Burton, Assistant United States Attorney,
23 counsel for the United States of America, and Joshua Tomsheck, Esq., counsel for Defendant,
24 KEYNAN ROSE, that the Sentencing currently scheduled for May 9, 2022 at 11:00 A.M. to a
25 date and time to be set by this Honorable Court, but no sooner than thirty (30) days.

26 This Stipulation is entered into for the following reasons:

27 1. This is the first Sentencing continuance request.

28 2. The additional time requested herein is not sought for purposes of delay, but due to
29 defense counsel being in a homicide trial for approximately three weeks and has not
30 been able to address important issues concerning Mr. Rose before his sentencing.

31 3. Defendant is in custody and does not object to the continuance.

32 4. The parties agree to the continuance.

33 5. Additionally, denial of this request for continuance could result in a miscarriage of
34 justice.

1 6. For the above stated reasons, the parties agree that a continuance of the Sentencing
2 date would best serve the ends of justice in this case.

3 DATED this 5th day of May, 2022.

4 Respectfully submitted,

5 HOFLAND & TOMSHECK

7 /s/ Joshua Tomsheck
8 JOSHUA TOMSHECK, ESQ.
9 Counsel for Defendant
9 KEYNAN ROSE

5 CHRISTOPHER CHIOU
6 Acting United States Attorney

7 /s/ Christopher Burton
8 CHRISTOPHER BURTON, ESQ.
9 Assistant United States Attorney

1 **HOFLAND & TOMSHECK**
2 Joshua Tomsheck, Esq.
3 State Bar of Nevada No. 009210
4 josht@hoflandlaw.com
5 228 South 4th Street, 1st Floor
6 Las Vegas, Nevada 89101
7 (702) 895-6760
8 (702) 731-6910 facsimile
9 *Attorney for Defendant*

10
11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA

14 Case No.: 2:18-cr-00206-JAD-DJA

15 Plaintiff,

16 vs.

17 KEYNAN ROSE,

18 Stipulation and Order to Continue
19 Sentencing
20 (First Request)

21 Defendant.

22 **FINDINGS OF FACT**

23 Based upon the pending Stipulation of counsel, and good cause appearing therefor,
24 the Court hereby finds that:

25 This Stipulation is entered into for the following reasons:

26 1. This is the first Sentencing continuance request.

27 2. The additional time requested herein is not sought for purposes of delay, but due to defense
28 counsel being in a homicide trial for approximately three weeks and has not been able
to address important issues concerning Mr. Rose before his sentencing.

3. Defendant is in custody and does not object to the continuance.

4. The parties agree to the continuance.

5. Additionally, denial of this request for continuance could result in a miscarriage of
justice.

6. For the above-stated reasons, the parties agree that a continuance of the Sentencing
Date would best serve the ends of justice in this case.

29 // /

ORDER

IT IS HEREBY ORDERED that the Sentencing date in the above-captioned matter currently scheduled for May 9, 2022 at 11:00 A.M. be vacated and continued to June 13, 2022, at 3:00 p.m.

DATED this 5th day of May, 2022.

UNITED STATES DISTRICT JUDGE

HOFLAND & TOMSHECK
228 SOUTH FOURTH ST., FIRST FLOOR
LAS VEGAS, NEVADA 89101
P: (702) 895-6760 • F: (702) 731-6910